

/s/ Elizabeth Rojas

I oppose plan confirmation because the **Debtor has failed to:**

- ☒ schedule debts within the limits of 11 USC §109(e); and therefore **ineligible**; and/or Debtor is not eligible to be a Chapter 13 Debtor as follows:
- **Potentially exceeds unsecured debt limit; Amend to disclose amounts of claims on Schedule F (all stated as "unknown")**
- ☐ **disclose** [11 USC §521, LBR 1017-1(b)]
☐ assets ☐ creditors ☐ income ☐ prior case
- ☐ **serve all** creditors with notice and the Plan at least 28 days before the 11 USC §341 (a) Meeting of Creditors, FRBPs 2002(b), 7004 and LBR 3015-1(b)(3);
- ☒ provide the Trustee **documentation of all income** (as well as any contributor's income) seven days before the §341(a) Meeting of Creditors. LBR 3015-1(c)(3), 11 USC § 521;
- **current paystub - debtor**
- ☐ meet the **business reporting requirements** regarding Debtor's business or self-employment, LBR 3015-1(c)(4);
- ☐ provide to the Trustee completed copies of the Federal and State **income tax returns**, 11 USC § 1308 and 521, LBR 3015-1(c)(3).
- ☒ propose a plan that is feasible 11 USC § 1325(a)(6); the plan is **infeasible** because
☐ certain claims are not included and/or the amount provided is insufficient
☐ income is not sufficient enough to fund it
☐ plan payment will not retire debt within term
☒ the plan does not propose treatment and/or properly treat all scheduled, priority and/or secured creditors; and/or plan deficiencies as follows:
- **Plan is not feasible: \$22 surplus v. \$555 proposed plan payment**
- **No boxes checked in Class 5, if not amended, must interlineate to pay creditors pro-rata**
- ☐ propose a plan that represents the Debtor's **best effort** 11 USC §1322; 11 USC §1325
☐ unreasonable and/or unnecessary expenses are scheduled
☐ the budget surplus exceeds the monthly plan payment
☐ comply with the Means Test as required by the Code, In re Kagenveama, 541 F3d 868, and/or In re Lanning, 1330 S.Ct.2464
- ☐ propose a plan that provides creditors as much as would be received under **Chapter 7** 11 USC §1325(a)(4).
- ☒ other issues as stated below:
- **Trustee to request interlineations that all tax returns be submitted to the Trustee; all tax refunds to be submitted into the plan and the Debtor will not incur debt greater than \$500 without Court permission.**

PROOF OF SERVICE

In Re: Karen Marie Shane
Case No. ND14-11585-PC

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Elizabeth Rojas
15060 Ventura Blvd.
Suite 240
Sherman Oaks, CA 91403

The foregoing document described as **TRUSTEE'S OBJECTION TO CONFIRMATION; NOTICE OF POSSIBLE DISMISSAL OR CONVERSION** will be served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

On September 22, 2014, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Karen Marie Shane
4523 N. Vistapark Drive
Moorpark, CA 93021

Russ W Ercolani
Ercolani Law Group
4195 E Thousand Oaks Bl Ste 175
Westlake Village, CA 91362

Hon. Robin Riblet
1415 State Street, Courtroom #201
Santa Barbara, CA 93101-2511

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: September 22, 2014

/s/ Patricia Trujillo
